

MELINDA HAAG (CABN 132612)
United States Attorney

J. DOUGLAS WILSON (DCBN 412811)
Chief, Criminal Division

NATALIE LEE (CABN 277362)
Assistant United States Attorney

450 Golden Gate Avenue, Box 36055
San Francisco, California 94102-3495
Telephone: (415) 436-7300
FAX: (415) 436-7234
Natalie.Lee2@usdoj.gov

Attorneys for the United States of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,)	CASE NO. CR-12-799 YGR
)	
Plaintiff,)	STIPULATED REQUEST TO CONTINUE
)	STATUS HEARING TO APRIL 24, 2014 AT 2:00
v.)	P.M. AND ORDER
)	
DANIEL RAMOS,)	Date: February 13, 2014
Defendant.)	Time: 2:00 P.M.
)	
)	

The above-captioned matter is set on February 13, 2014 at 2:00 p.m. before this Court for a status hearing. The government has produced a significant amount of discovery to defense counsel for this case, and defense counsel is reviewing the discovery and conducting further investigation in the case. Further, counsel for the government and defendant are actively trying to resolve this case in which defendant faces the possibility of substantial mandatory minimum penalties. Further, defense counsel is out of the office from February 1 through February 13, 2014 and unavailable. Therefore, for all of these reasons, both counsel for the government and defendant request that the status hearing previously scheduled for February 13, 2014 be continued to April 24, 2014 at 2:00 p.m. in order to give defense counsel time to conduct investigation into this case and to give counsel for both sides time to conduct plea negotiations. It is anticipated that this will be one of the last requested continuances in this case.

STIP TO CONTINUE
CR-12-799 YGR

1 The Court has previously excluded the running of the speedy trial clock for effective preparation
 2 of counsel, 18 U.S.C. § 3161(h)(7)(B)(iv), through February 13, 2014. Therefore, the parties now
 3 request that the time between February 13, 2014 and April 24, 2014 be excluded from the running of the
 4 speedy trial clock for that same reason – effective preparation of counsel, 18 U.S.C. § 3161(h)(7)(B)(iv).
 5 The parties agree that, taking into account the public interest in prompt disposition of criminal cases,
 6 good cause exists for this continuance. The parties also agree that the ends of justice served by granting
 7 such a continuance outweigh the best interests of the public and the defendant in a speedy trial. 18
 8 U.S.C. § 3161(h)(7)(A).

9
 10 SO STIPULATED:

MELINDA HAAG
 United States Attorney

11
 12 DATED: January 29, 2014

/s/
 13 NATALIE LEE
 Assistant United States Attorney

14 DATED: January 29, 2014

/s/
 15 LAUREL L. HEADLEY
 Attorney for Daniel Ramos

16
 17
 18
 19 For the reasons stated above, the status hearing in this matter is continued until April 24, 2014 at
 20 2:00 p.m. The Court finds that the exclusion of time from February 13, 2014 through April 24, 2014 is
 21 warranted and that the ends of justice served by the continuance outweigh the best interests of the public
 22 and the defendant in a speedy trial. 18 U.S.C. § 3161 (h)(7)(A). The failure to grant the requested
 23 continuance would deny the defendant effective preparation of counsel. 18 U.S.C. § 3161(h)(7)(B)(iv).
 24 SO ORDERED.

25 DATED: February 5, 2014

26 
 27 HONORABLE YVONNE GONZALEZ ROGERS
 United States District Judge